

# SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION PLAN

Updated as of: January 25, 2010

**Facility Name:** Ethan Allen Elementary School # 8200  
**Facility Address:** 6329 Battersby Street Philadelphia, PA 19149  
**Date of Audit:** 01/08/10  
**Date CAP Due to EPA:** 3/9/10

| Finding Number   | Regulatory Citation          | Finding  | Corrective Action  | Corrective Action Status (include date when closed)   | Preventative Measure  |
|--|------------------------------|--|--|---|---|
| <b>ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763 Subpart I</b> |                              |  |  |   |   |
| 1  | (40 CFR § 763.85(b))         | The school is required to complete Three Year Re-inspections. Data gaps ranging from one (1) to six (6) months were identified following the original management plan of 1988, the 1995, the 2001 and the 2004 Three Year Re-inspections. These inspections were not completed within the required three (3) year time frame.  | The school must complete the Re-inspections every three (3) years. This is a historical finding as the school can not complete missing data gaps.  | Historical finding. Corrective Action can not be completed.   | A compliance calendar should be established and implemented to ensure the timely completion of the Three Year Re-inspections.   |
| 2  | (40 CFR § 763.85(b)(1)(vii)) | The regulations require that the Three Year Re-inspections records be updated within thirty (30) days of the inspection. The most recent Re-inspection Report is dated January 2007 and was available for review at the central file and the school building. However it was recently printed/distributed and was not completed within the required thirty (30) day time frame from the inspection date in January 2007. | The Three Year Re-inspection records must be updated within thirty (30) days of the actual inspection. This is a historical finding.   | Historical finding. Corrective Action can not be completed.   | A compliance calendar should be established and implemented so that the thirty (30) day update can be tracked by the personnel in the central office for the next Three Year Re-inspection in 2009. |
| 3  | (40 CFR § 763.94)(d)         | The school is required to complete Six Month Periodic Surveillance Inspections. Varied data gaps exist between the Six Month Periodic Surveillance Inspections from 1989 to 2008 ranging from one (1) to twenty one (21) months. These inspections were not completed within the required six (6) month time frame.  | The school must complete Periodic Surveillance Inspections every six (6) months. This is a historical finding as the school can not complete past missed inspections.  | Historical finding. Corrective Action can not be completed.   | A compliance calendar should be established and implemented to ensure the timely completion of the Six Month Periodic Surveillance Inspections.   |
| 4  | (40 CFR § 763.94)            | The regulations require the school to maintain all Operations and Maintenance (O&M) records, only partial records were found at the school.  | Prepare copies of the missing O&M records and distribute to the administration office for inclusion in the management plan. The following reports were not found at the school.<br>USA 06-010001-67 2/8/06<br>Synertech 010-2251 11/30/04<br>Synertech 010-2122-15 8/31/04 | <b>Closed 1/25/10-</b> Copies of the missing response actions were prepared by URS and distributed to the School for their records.     | A letter should be sent to all school administrators reminding them of the AHERA record keeping procedures and the importance of maintaining all asbestos documentation.                            |
| 5  | (40 CFR § 763.93 (g)(3))     | The school is required to maintain copies of previous Re-inspection reports. The 1992 Re-inspection report was not found at the school.  | Prepare a copy from the central file and send to the school.   | <b>Closed 1/25/10 -</b> A copy of the missing Re-inspection Report was prepared by URS and distributed to the School for their records. | Include notification letter instructing the principal to maintain with the other files.   |